

JASON R. MAIER, ESQ.
Nevada Bar No. 8557
JOSEPH A. GUTIERREZ, ESQ.
Nevada Bar No. 9046
SOPHIA A. ROMERO, ESQ.
Nevada Bar No. 12446
MAIER GUTIERREZ & ASSOCIATES
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Telephone: 702.629.7900
Facsimile: 702.629.7925
E-mail: jrm@mgalaw.com
jag@mgalaw.com
sar@mgalaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER LAMPKIN,

Plaintiff,

vs.

UNITED STATES OF AMERICA ex rel
UNITED STATES POSTAL SERVICE,

Defendant.

Case No.: 2:23-cv-00301-RFB-VCF

**STIPULATION AND ORDER TO HOLD
EXPERT DISCLOSURE DEADLINE IN
ABEYANCE PENDING COURT
DECISION ON DEFENDANT'S MOTION
TO EXTEND [ECF NO. 23]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their respective attorneys, as follows:

The current discovery plan and scheduling order [ECF No. 20] outlines the current deadlines:

- Discovery cut-off date: November 27, 2023
- Amending the Pleadings and Adding Parties: August 29, 2023
- Expert Disclosures: September 28, 2023
- Rebuttal Expert Disclosures: October 30, 2023
- Dispositive Motions: December 27, 2023
- Pretrial Order: January 26, 2024

On September 20, 2023, defendant filed its motion to extend discovery deadlines by 90 days [ECF No. 23]. Plaintiff filed a response to defendant's motion on September 26, 2023 [ECF No. 25]. The hearing on defendant's motion is scheduled for October 2, 2023.

The Expert Disclosure deadline is currently September 28, 2023, prior to the October 2, 2023 hearing. This presents a timing and fairness problem such that if plaintiff makes his expert disclosures on September 28, 2023 (which plaintiff is fully prepared to do), and the Court later grants defendant's motion on October 2, 2023 (which plaintiff has opposed), plaintiff will be prejudiced as defendant will have the unfair advantage of having plaintiff's expert disclosures in advance of making its own Expert Disclosures.

Accordingly, to prevent any prejudice or unfair advantages, the parties hereby stipulate that the current Expert Disclosure deadline of September 28, 2023, be held in abeyance for four calendar days until October 2, 2023, which is the date set for the hearing on defendant's motion to extend [ECF No. 23].

DATED this 27th day of September 2023.

MAIER GUTIERREZ & ASSOCIATES

/s/ Jason R. Maier

JASON R. MAIER, ESQ.
Nevada Bar No. 8557
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Attorneys for Plaintiffs

DATED this 27th day of September 2023.

AUSA, CIVIL DIVISION

/s/ Skyler H. Pearson

SKYLER H. PEARSON, ESQ.
AUSA, Civil Division
501 Las Vegas Blvd., South, Suite 1100
Las Vegas, Nevada 89101
Attorneys for Defendant

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 9-27-2023